

**UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF MISSOURI**

UNITED STATES OF AMERICA,

Plaintiff,

VS.

OSCAR DILLON, III, et al.,

Defendant.

No.: 4:15-CR-404-HEA-NAB-30

OSCAR DILLON, III'S PROPOSED VOIR DIRE QUESTIONS

Comes now the defendant, Oscar Dillon III, by and through his undersigned attorneys, and respectfully requests that the following questions be asked of the venire members during the course of *voir dire* examination:

1. Have you or any of your close friends or family members ever undergone treatment for drug addiction? If so, what is your relationship to the person that underwent treatment? Is there anything about your experience with drug addiction or drug treatment that might prevent you from being fair to defendants accused of associating with individuals who sell drugs?
2. Have you or any of your close friends or family members ever worked in the field of law enforcement in the past? The field of law enforcement includes any police department, military police, or federal law enforcement agency including: the Drug Enforcement Administration, the Federal Bureau of Investigation, the Bureau of Alcohol, Tobacco, and Firearms, the Secret Service, the United States Marshals Service, and the Internal Revenue Service. If your friends or family have

worked in law enforcement, do you discuss their work with them? Is there anything about those discussions that might prevent you from being fair to defendants or the government in this case?

3. In this case, you will be required to judge each defendant's actions individually. Do you believe that you are capable of judging a defendant separately and individually even if the evidence indicates that some of the defendant's friends and/or associates committed crimes?

4. Do you believe that a person can be guilty by association?

5. Do you understand and accept that the defendant is presumed innocent of the charge(s) against him?

6. Do you understand and accept that before a defendant can be convicted, the Government must prove the defendant guilty beyond a reasonable doubt?

7. Do you understand and accept that the defendant is not required to offer any evidence on his own behalf?

8. Do you understand and accept that the defendant's choosing not to testify cannot be held against him?

9. Because the burden of proof rests with the Government, it will have the first and last word during the course of this trial. As such, do we have your assurance that you will wait until you have heard all of the evidence from both sides before you reach any conclusions about the case?

10. Do any of you hold any preconceived notions, opinions or beliefs which cause you to favor the prosecution over the defense or vice versa?

11. The Judge will instruct you that you should not be influenced by any person's race, color, religion, national ancestry or sex"—both defendants here are African-American citizens, will any of you have any difficulty in following that instruction as to the ethnicity, or race of these defendants rather than deciding this case solely on the basis of the evidence that's presented to you?

Respectfully submitted,

/s/ Blaire C. Dalton
An Attorney for Oscar Dillon, III

/s/ Vadim A. Glozman
An Attorney for Oscar Dillon, III

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